

[Parties and Counsel Listed on Signature Pages]

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

This Document Relates To:

ALL ACTIONS

MDL No. 3047

Case No. 4:22-md-03047-YGR (PHK)

**JOINT STATUS REPORT ON
PRIVILEGE LOG PROTOCOL**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

Pursuant to Discovery Management Order No. 3 (ECF 667), the Parties submit this joint status report regarding the privilege log protocol. The Parties, including lead trial counsel, met and conferred via videoconference regarding the privilege log protocol on March 1, 2024. Plaintiffs subsequently circulated a revised draft of the privilege log protocol and Defendants circulated a list of categorical privilege log descriptions. At this time, the Parties identify the following areas where they continue to meet and confer:

- Definitions;
- Exclusions from privilege logging;
- Logging of documents redacted for privilege;
- Additional supplemental privilege descriptions when needed to assess claim of privilege;
- List of topics for metadata-plus-topic privilege log;
- Option to produce a narrative log with privilege descriptions in lieu of the metadata-plus-topic privilege log; and

- Timing of production of privilege logs.

The parties are continuing to meet and confer in an attempt to resolve the disputes and will provide an update to the Court in the next DMC Statement, due March 15, 2024.

Respectfully submitted,

DATED: March 6, 2024

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ATTESTATION

I, Ashley M. Simonsen, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: March 6, 2024

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